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February 9, 2001

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

VIA COURIER SERVICE

Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Notice of *Ex Parte* Presentation by Global Metro Networks
CC Docket Nos. 98-147, 96-98

Dear Secretary Salas:

Pursuant to section 1.1206(b)(1) of the Commission's Rules, Global Metro Networks (GMN), by its attorneys, submits this notice of a written *ex parte* presentation in the above-captioned proceeding. The presentation, filed herewith, is directed to William Kehoe of the Policy and Program Planning Division, Common Carrier Bureau. In addition, GMN is also delivering courtesy copies to Brent Olson, Kimberly Cook, Rachel Du Fault, and Alex Johns of the Policy and Program Planning Division, Common Carrier Bureau, and Shanti Gupta and Jerry Stanshine of the Commission's Office of Engineering and Technology.

Pursuant to section 1.1206(b)(1), an original and four copies of this *ex parte* notice (with enclosure) are provided for inclusion in the public record of the above-referenced proceeding. Please direct any questions concerning this filing to the undersigned.

Respectfully submitted,

Patrick J. Donovan
D. Anthony Mastando

Counsel for Global Metro Networks

Enclosure

cc: International Transcription Service
Steven F. Morris

No. of Copies rec'd 0+4
List ABCDE

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Director, Regulatory Affairs

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globalmetro networks
the new city standard™

February 9, 2001

VIA HAND DELIVERY
William Kehoe
Common Carrier Bureau
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

RE: ***Ex Parte***
CC Docket No. 98-147
CC Docket No. 96-98

Dear Mr. Kehoe:

On January 30, 2001, Global Metro Networks (GMN) met with the staff of the Common Carrier Bureau and the Office of Engineering and Technology to discuss pending issues in the above-referenced docket. During that meeting, the staff had a number of questions regarding the mechanics of how a carrier like Global Metro Networks would connect its fiber network to the equipment of other CLECs within an ILEC central office.

In this letter, we provide information on three different scenarios that all would enable GMN to connect to other carriers in the central office. These scenarios could also be used to connect with the ILEC.[1] In each case, GMN would install a fiber frame that fits within a standard telecommunications rack or cabinet. A jumper cable would run from the equipment of the other carrier to the GMN frame. The first scenario would require slightly more than 50 square feet of floor space; the other two scenarios generally would will require less than 50 square feet.

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[1] For example, the equipment identified in this letter could be used by GMN if it were to purchase dark fiber from an ILEC as an unbundled network element.

1. Frame with fiber monitoring capabilities. GMN could install equipment that would permit connections to other carriers and also provide the capability to monitor the fiber. The equipment, shown in Exhibit A, would have the ability to hold up to 864 fibers (2 bays, each with 6 terminal blocks that are each capable of holding 72 fibers). There is a fiber trough in the rear for fiber jumper management. Each of the three bays in the rack is 7'H x 30"W x 24"D.

2. Frame without fiber monitoring capabilities. A second alternative available to GMN would be to install equipment that permits connections to other carriers, but does not include fiber monitoring capabilities. This equipment, shown in Exhibit B, includes only a single bay with the ability to hold two 144 count fiber cables. The bay is 7'H x 23"W x 5"D. Additional bays could be installed if greater capacity were needed.

3. Fiber entrance cabinet. In cases where GMN places its equipment in a cable vault, rather than a collocation space, it would use a fiber entrance cabinet. Each cabinet is capable of holding 864 fibers. A dual cabinet arrangement, pictured in Exhibit C, would accommodate fibers that enter the building from two separate locations. Each cabinet is 32"W x 45"H x 13"D.

As the attached exhibits demonstrate, the equipment necessary for GMN to connect to other carriers within a central office would impose relatively minimal space requirements on an ILEC. Third party collocation sites and carrier hotels actively encourage GMN and other carriers to place this type of equipment in their facilities for the purpose of cross-connecting to other carriers. Connection at third party sites is not, however, a substitute for connection at the central office. Even if a CLEC connects to GMN at a neutral site the CLEC still must obtain fiber into and out of the central office. The presence of a carrier like GMN in a central office would facilitate the ability of multiple CLECs to collocate in that office quickly and efficiently.

GMN would be happy to meet with the staff to answer any additional questions you have regarding the attached information. Please do not hesitate to call should you have any questions.

Sincerely,

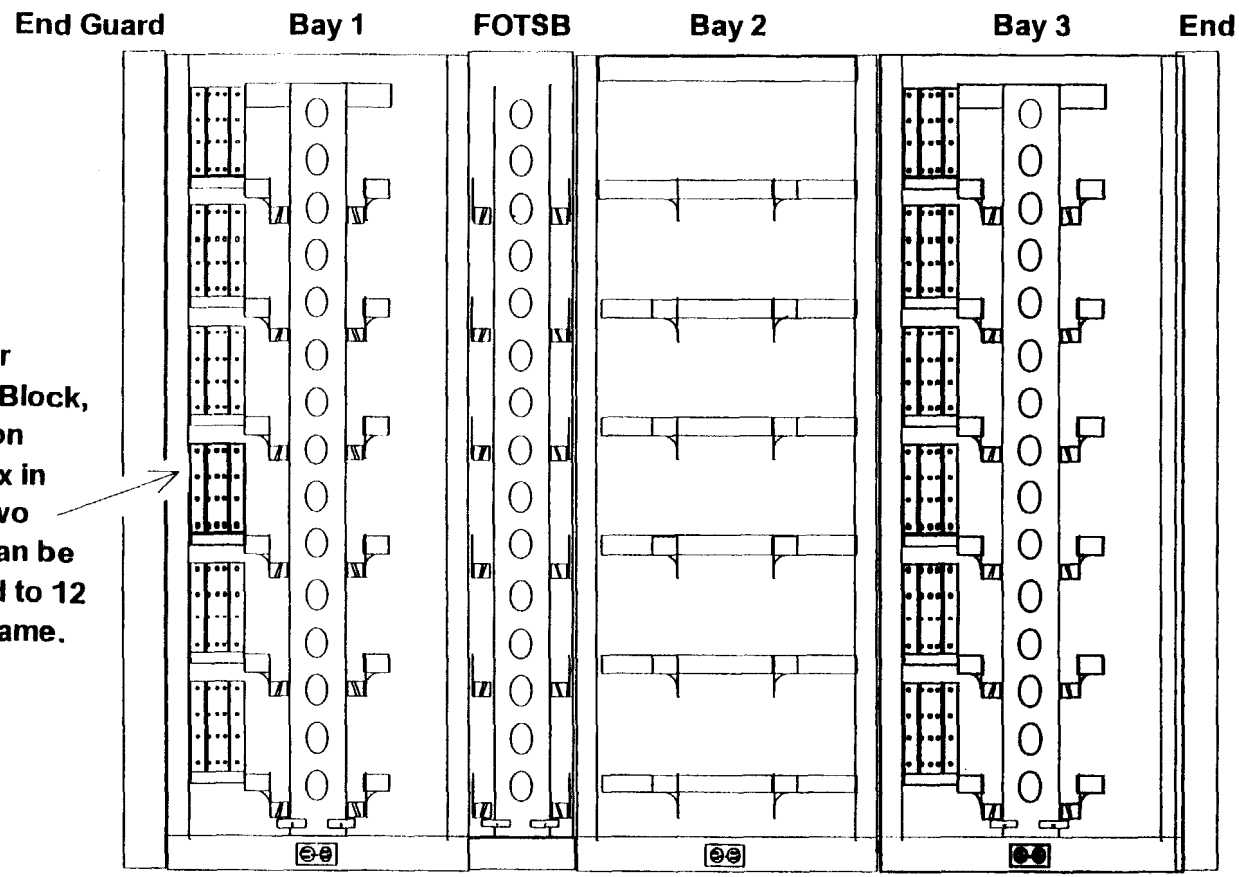
Steven F. Morris
Director, Regulatory Affairs

CC: Brent Olson
Kimberly Cook
Rachel Du Fault
Alex Johns
Shanti Gupta
Jerry Stanshine

EXHIBIT A

FRAME WITH FIBER MONITORING CAPABILITIES

Global Metro NGF (Next Generation Frame) Bay Configuration



NGF Fiber Terminal Block, 72 Position (one of six in each of two frames, can be expanded to 12 in each frame.

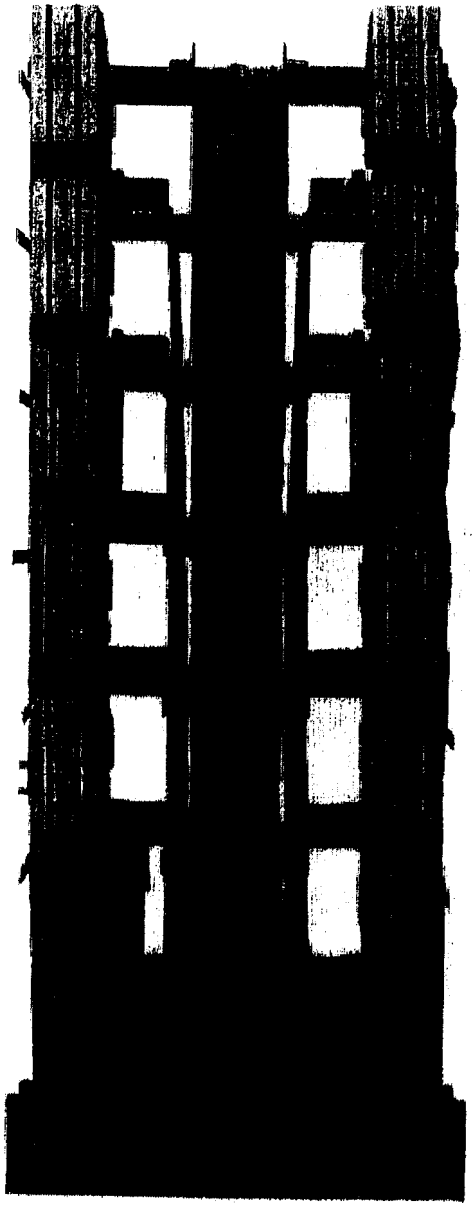
Bay 2 is a Maintenance Bay that includes a single equipment shelf.

FTBs are to be equipped with E2000 adapters.

GlobalMetrobays10108

	Bay 1 - NGF Next Generation Fiber Frame [first of three in line-up]				
1	NGF-MDF7A100-30	1	FMDF Frame Section	Fiber Main Distribution Frame - has six 5" horizontal troughs & built in jumper storage	7'H x 30"W x 24"D Putty White
2	NGF-ACC000027	1	End Guard	End Guard (for end of line-up)	24"D
3	NGF-ACCFOTSB	1	Storage Bay	Fiber Optic Terminal Slack Cable Storage Bay	7'H x 12"W x 24"D Putty White
4	4-26860-6462	1	Cable Clamp	Cable Clamp Kit (one for each cable to frame)	N/A
5	NGF-TB3BLUV	6	FTB	Fiber Termination Block, E-2000, 72 Position, Left, Upward, Angled	Color: Putty White
					Total Bay 1:
	Bay 2 - Maintenance Next Generation Fiber Frame [second of three in line-up]				
1	NGF-MDF70EB23-30	1	Frame	Equipment Frame, NGF	30"W
2	NGF-ACCSHELF1-30	1	Shelf	Work Shelf	30"W
					Total Bay 2:
	Bay 3 - NGF Next Generation Fiber Frame [third of three in line-up]				
1	NGF-MDF7A100-30	1	FMDF Frame Section	Fiber Main Distribution Frame - has six 5" horizontal troughs & built in jumper storage	7'H x 30"W x 24"D Putty White
2	NGF-ACC000027	1	End Guard	End Guard (for end of line-up)	24"D
3	4-26860-6462	1	Cable Clamp	Cable Clamp Kit (one for each cable to frame)	N/A
4	NGF-TB3BLUV	6	FTB	Fiber Termination Block, E-2000, 72 Position, Left, Upward, Angled	Color: Putty White
					Total Bay 3:

NGF Bay Graphic



Test Bay Graphic

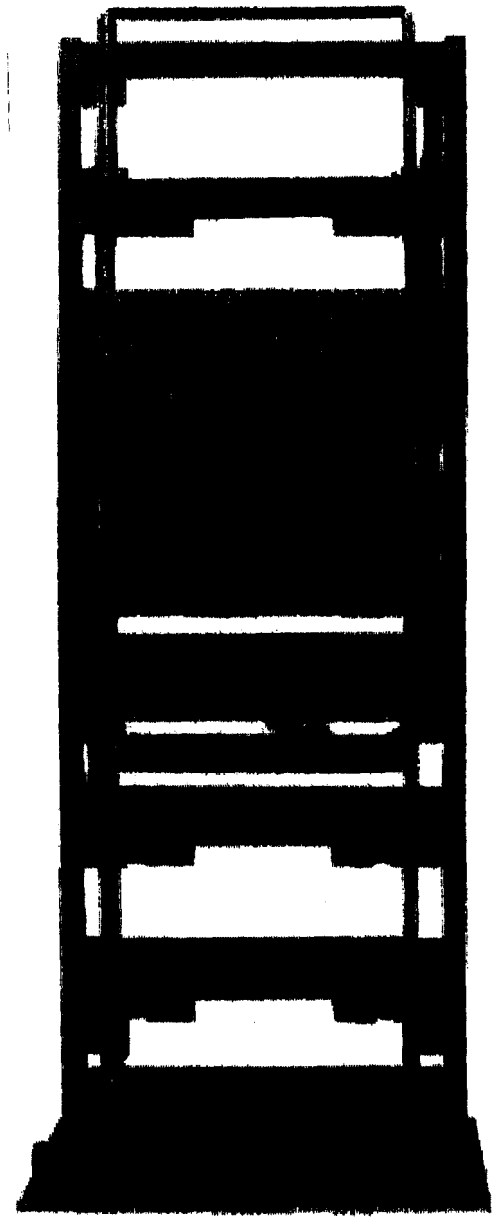
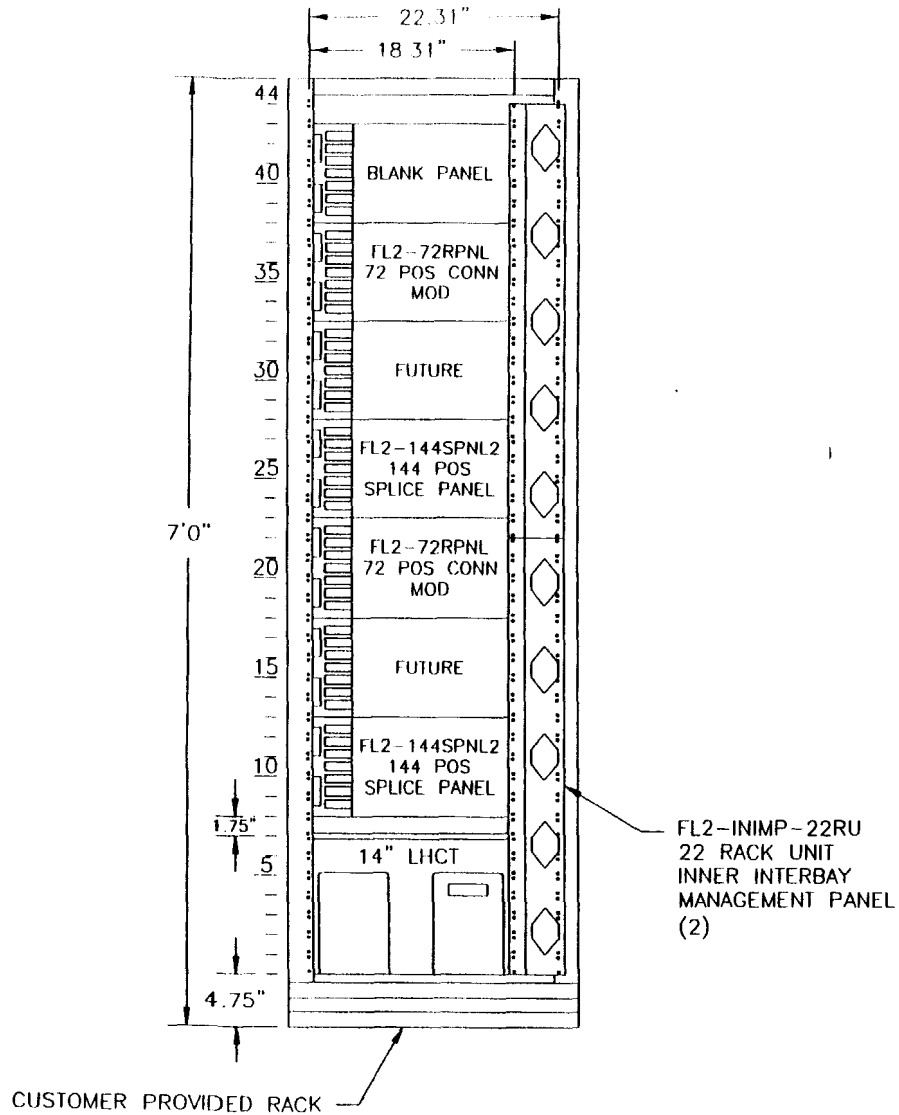


EXHIBIT B

FRAME WITHOUT FIBER MONITORING CAPABILITIES

DATE
12/22/00

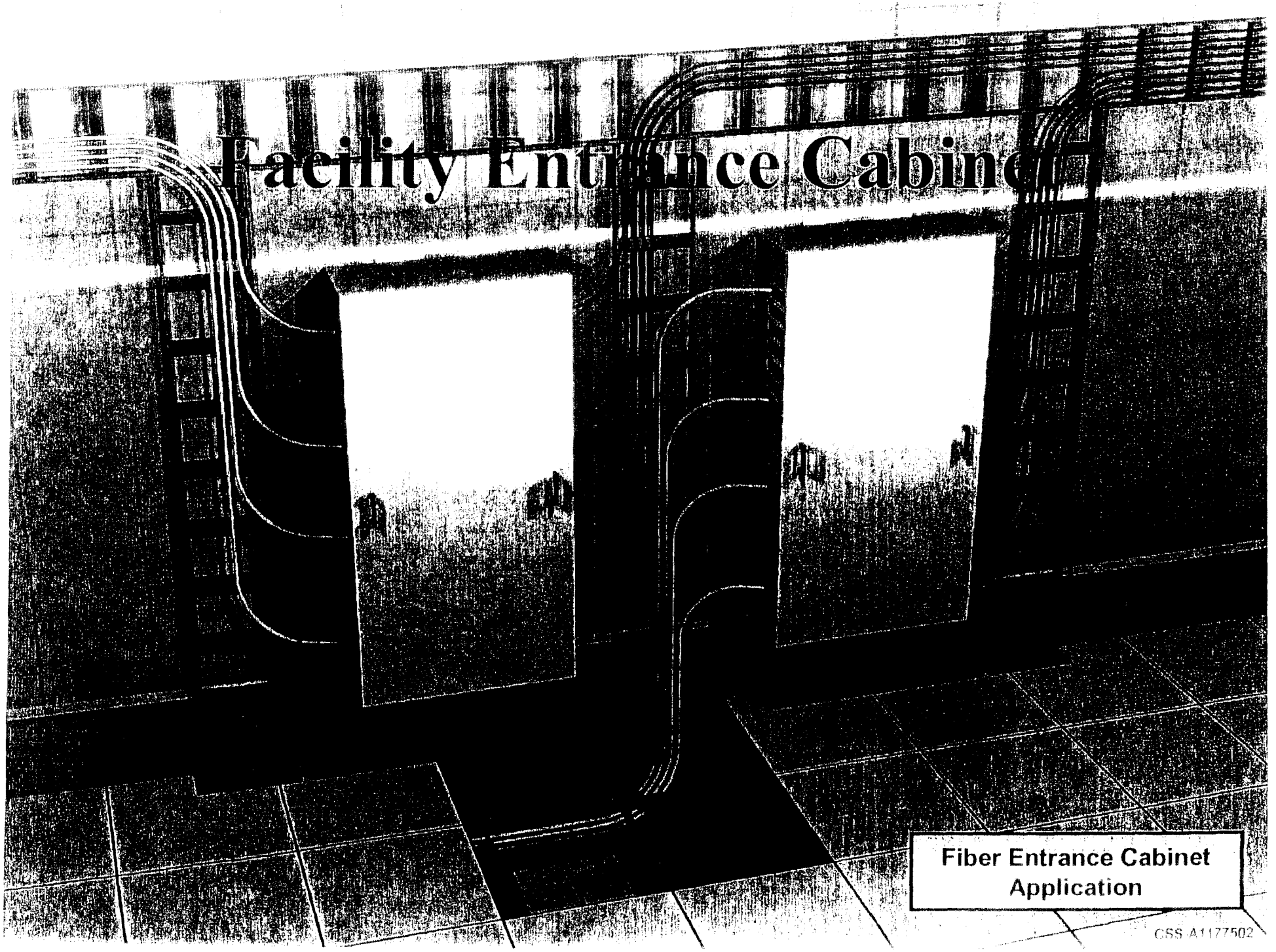

22.31"
18.31"
44
40
35
30
25
20
15
10
5
7'0"
1.75"
4.75"
BLANK PANEL
FL2-72RPNL
72 POS CONN
MOD
FUTURE
FL2-144SPNL2
144 POS
SPLICE PANEL
FL2-72RPNL
72 POS CONN
MOD
FUTURE
FL2-144SPNL2
144 POS
SPLICE PANEL
14" LHCT
FL2-INIMP-22RU
22 RACK UNIT
INNER INTERBAY
MANAGEMENT PANEL
(2)
CUSTOMER PROVIDED RACK

	FL2000 Splice and Termination Modules (E2000) for Co-Lo Sites [to mount in user provided 19" frame, no pigtails]				
1	FL2-ACC011	1	Trough	Lower Cable Trough	14"H x 19"W x 5"D
2	FL2-72RPNL	2	Term Panel	Termination Panel, Frame or Cabinet Mount, 72 Fiber Capacity	8.75"H x 10.14D Color: Putty
3	FL2-6PSMAE2	24	6 Pak	6pak Adapter Plug-Ins, E-2000 Angle Polish	N/A
4	FL2-144SPNL	2	Fiber Splice Module	Splice Module (Chassis) for 144 fiber capacity (houses splice wheels)	8.75"H x 10.14D Color: Putty
5	FST-DRS12-HS	24	Splice Wheel	Splice Wheel with Splice Chip, Heat Shrink Fusion	N/A
6	FL2-ACC007	2	Cable Clamp	Cable Clamp Kit - Qty 1	N/A
7	FL2-BLNKFULL0875	1	Kit	Kit, FL2 Blank Skel, VC	N/A
8	FST-ACC002	144	Sleeve	Splice Protector Sleeve - Qty 1	60mm
9	E-501-L37	1	Ground	Ground Wire Kit	N/A
10	FL2-ACC006	2	Bond Kit	Bonding Grounding Kit - Qty 1	N/A
11	IPA-K1	6	Lock	Lock for Rack Mount Panel	N/A
				Total FL2000 [E2000]:	
	FL2000 Splice and Termination Modules (SC) for Co-Lo Sites [to mount in user provided 19" frame, no pigtails]				
1	FL2-ACC011	1	Trough	Lower Cable Trough	14"H x 19"W x 5"D
2	FL2-72RPNL	2	Term Panel	Termination Panel, Frame or Cabinet Mount, 72 Fiber Capacity	8.75"H x 10.14D Color: Putty
3	FL2-6PSMASC	24	6 Pak	6pak Adapter Plug-Ins, Single-mode SC w/8 Degree Angle Polish	N/A
4	FL2-144SPNL	2	Fiber Splice Module	Splice Module (Chassis) for 144 fiber capacity (houses splice wheels)	8.75"H x 10.14D Color: Putty
5	FST-DRS12-HS	24	Splice Wheel	Splice Wheel with Splice Chip, Heat Shrink Fusion	N/A
6	FL2-ACC007	2	Cable Clamp	Cable Clamp Kit - Qty 1	N/A
7	FL2-	1	Kit	Kit, FL2 Blank Skel, VC	N/A
8	FST-ACC002	144	Sleeve	Splice Protector Sleeve - Qty 1	60mm
9	E-501-L37	1	Ground	Ground Wire Kit	N/A
10	FL2-ACC006	2	Bond Kit	Bonding Grounding Kit - Qty 1	N/A
11	IPA-K1	6	Lock	Lock for Rack Mount Panel	N/A
				Total FL2000 [SC]:	
	FL2000 Splice and Termination Modules (SC) for Co-Lo Sites [to mount in user provided 19" frame, includes pigtails]				
1	FL2-ACC011	1	Trough	Lower Cable Trough	14"H x 19"W x 5"D
2	FL2-72RPNL	2	Term Panel	Termination Panel, Frame or Cabinet Mount, 72	8.75"H x 10.14D
3	FL2-6PSMASC	24	6 Pak	6pak Adapter Plug-Ins, Single-mode SC w/8 Degree	N/A
4	FL2-144SPNL	2	Fiber Splice Module	Splice Module (Chassis) for 144 fiber capacity (houses splice wheels)	8.75"H x 10.14D Color: Putty
5	FST-DRS12-HS	24	Splice Wheel	Splice Wheel with Splice Chip, Heat Shrink Fusion	N/A
6	FL2-ACC007	2	Cable Clamp	Cable Clamp Kit - Qty 1	N/A
7	FL2-BLNKFULL0875	1	Kit	Kit, FL2 Blank Skel, VC	N/A
8	FST-ACC002	144	Sleeve	Splice Protector Sleeve - Qty 1	60mm
9	E-501-L37	1	Ground	Ground Wire Kit	N/A
10	FL2-ACC006	2	Bond Kit	Bonding Grounding Kit - Qty 1	N/A
11	IPA-K1	6	Lock	Lock for Rack Mount Panel	N/A
				Total FL2000 [SC w/Pigtails]:	

EXHIBIT C

FIBER ENTRANCE CABINET

Facility Entrance Cabinet

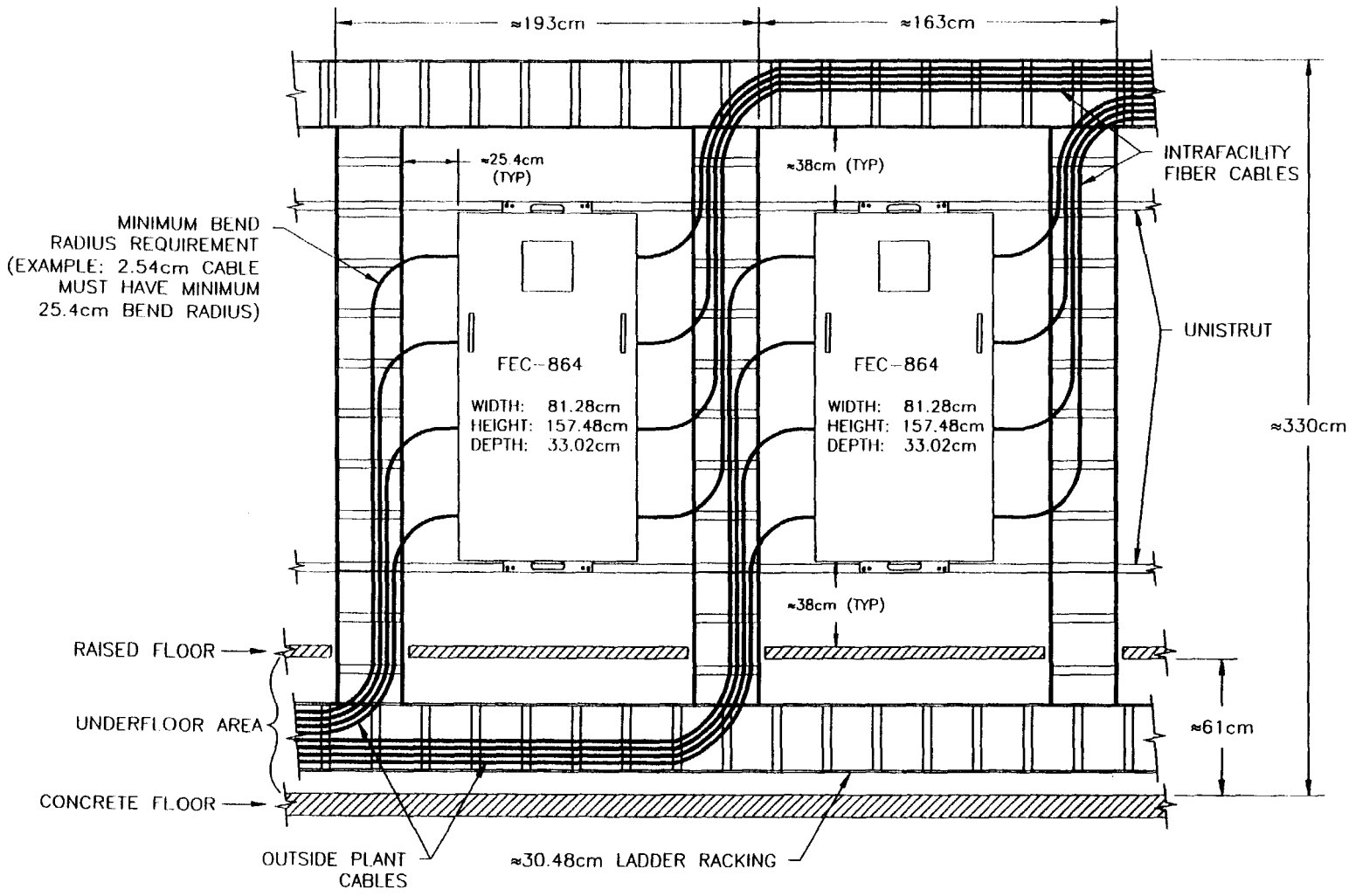


Fiber Entrance Cabinet
Application

CSS A1177502

Detailed FEC

DATE
06/10/98



	Fiber Entrance Cabinets				
1	FEC-576	2	FEC	Fiber Entrance Cabinet, 576 Capacity, includes 24 single standard drawers	32"W x 45"H x 13"D Putty White
2	FST-D-HS	12	Splice Tray	Splice Tray, Dual 24 fiber, Heat Shrink Fusion	N/A
3	OSP-CLPFEC	2	Cable Clamp	Cable Clamp Kit (separates and clamps three cables)	N/A
4	GAK-FEC001	2	Ground Kit	Grounding Kit, OSP Unitube Fiber Cables	N/A
5	BLK-RLBT-A606	2	Block Kit	Blocking Kit	N/A
6	BLK-RIFC-A02C0	12	Block Kit	Ribbon Blocking Kit, IFC 12 Fiber w/center tube OD of .325 to .425	N/A
7	FSC-MT	12	Splice Chip	Splice Chip, mechanical (elastomeric)	N/A
8	FST-ACC006	72	Protector	Splice Protector, Fusion Splice, 60 mm long, package of 50	N/A
					Total Bays 2: